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April 25, 2006

Stephan Collins  
Assistant U.S. Attorney  
222 W. 7<sup>th</sup> Avenue, #9, Rm 253  
Anchorage, Alaska 99513-7567

Re: *USA v Rainey*

Dear Stephan:

In an effort to try and make sure that I haven't overlooked anything, I am sending you this request for discovery under Fed. R. Crim. P. 12(b)(4)(B) and 16(a)(1).

Please also accept this letter as Ms. Rainey's request for disclosure of all exculpatory evidence under Brady v. Maryland, 373 U.S. 83 (1963), Giglio v. United States, 405 U.S. 150(1972), and Kyles v. Whitely, 514 U.S. 419 (1995). To avoid delay associated with the late disclosure of exculpatory information, Ms. Rainey asks you to consult with the case agents to ensure that all such evidence has been revealed to you.

Finally, to foster pretrial resolution of this matter and to avoid trial delays sometimes associated with the disclosure of witness' statements pursuant to 18 USC 3500, request is hereby made for early disclosure of all witness statements.

Thank you for your attention to these matters. Please let me know when any of the above requested information will be made available.

Very truly yours,



D. Scott Dattan

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